Bell Atlantic

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BACKGROUND

On September 25, 1996 a Bell Atlantic document, PR-D96-087, entitled, "Telecom Act 1996; Access to Poles, Conduit and Right of Way" was issued. This document provided Bell Atlantic policy for non-discriminatory access for Cable Television and Telecommunications providers (referred to herein as licensees or approved licensees) to Bell Atlantic poles, ducts, conduit and right of way.

Subsequently, another document, PR-D97-114, entitled "Internal Procedures to Comply with FCC 251 Rule", was issued. This letter provided further details and internal procedures on how to comply with the 1996 Act and the 251 Rules relative to our scheduled occupation of space, notification to licensees of modification to structures that they occupy and denial of access procedures.

While the FCC considers "pole attachments" in the universal sense to include joint occupancy in ducts, conduit and right of way, **this letter will limit its discussion to "poles only" and the various approved methods of attachment to those poles.** These methods will apply unilaterally to joint use as well as non-joint use poles and will be directed specifically toward situations where space on a pole is either being applied for by an approved licensee or will be used by Bell Atlantic. These methods must be applied uniformly to Bell Atlantic and all licensed applicants. While the PR documents referenced on the cover sheet discuss the implementation of the 1996 Telecommunications Act and the FCC 251 Rules, **this letter is intended to address the approved methods of pole attachments for Bell Atlantic and all approved licensees.**

Except where local laws, ordinances, and joint use agreements vary widely from one jurisdiction to another, we must otherwise be consistent in the application of the hardware and methods used to attach cables for ourselves and all approved licensees. Licensees should expect the same standards to apply, within the law, when dealing with Bell Atlantic from one district to another. **This document is not intended to tell the field how to enforce the rules of joint occupancy. Where differences or disputes cannot be resolved between Bell Atlantic and the approved licensees on a local basis, they should be referred to the Joint Use Coordinators for mediation.**

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They are:

Don Cameron	804-772-6604	VA and W V
Bruce Stanley	973-649-3007	NJ
Jim Giancola	215-931-4931	PA and DE
Steve Smith	410-393-6711	Md. and DC
George Belcher	207-797-1310	ME, VT, NH
Marc Berlinger	617-342-0428	MA and RI
Jim Slavin	212-395-7208	NY

If the Joint Use Coordinators require additional support, they should contact Alan Young (215-466-8809) whose responsibilities include joint use.

Finally, every method described herein will be subject to all federal, state, county and municipal codes and regulations, as well as the National Electric Safety Code, Bell Atlantic Practices and the terms of any Joint Use Agreements in effect in your area.

APPROVED BELL ATLANTIC METHODS AVAILABLE TO MAKE SPACE FOR ADDITIONAL POLE ATTACHMENTS

The methods listed below, generally speaking, are in order of preference, however the engineer must consider safety and other factors before making a decision.

1) Raise or lower the existing attachments on the pole to provide space for the additional attachments. A minimum of 12 inches separation must be maintained between Bell Atlantic and licensee attachments.

2) A "B" bolt or backside hanger may also be used to mount the additional attachment to the field (back) side of the pole where permissible (some joint use agreements may not permit this as an option). Bell Atlantic will not allow other licensees to share our hardware (suspension strand, guys, bolts, extension arms, extension bolts, etc.) for their own attachments since we have no control over their construction standards, hardware or procedures. By the same token, Bell Atlantic will not share the same type of hardware owned by other licensees to make our attachments. It is essentially a safety issue for us. Guy wire anchors may be shared with licensees when so specified in the licensing agreement.

3) Based on engineering judgment, B and C Cable Extension Arms may be used, on a limited basis to support additional cables where proper clearance between telephone, power and licensee facilities cannot otherwise be achieved. Historically, Bell Atlantic South has primarily used extension arms to offset a slight pull on a pole when guying was not possible. Bell Atlantic will not permit the use of an extension arm where it would close in an existing cable of another attaching licensee or other joint use entity. The use of an extension arm is generally applicable where the separation between existing telephone cable and a power facility is between 46 and 51 inches (refer to AT&T Practice 627-220-202, page 5, fig. 4, and neither facility can be relocated to achieve clearance for the additional facility.

For details on clearances, refer to Section 3 of the Bellcore Blue Book Manual of Construction Procedures Special Report SR-1421 issue 2, Dec. 1996. Extension arms can physically handle more than one cable based on the cable weight and adjacent span lengths (see AT&T Practice 627-220-202, page 3, table B) but a minimum of 12 inches separation must be maintained between licensees. Bell Atlantic owned extension arms are not to be shared with licensees, nor will Bell Atlantic share extension arms owned by licensees for the same reasons described in item number two (2) above.

Every effort must be made to preserve the climbing space on the pole. Refer to the Bellcore Blue Book Manual, section 3, page 13, mentioned in the previous paragraph for more details about climbing space.

4) **Cable extension bolts and straps** attach to the threaded end of suspension bolts in the pole. The strap supports the outer end of the extension bolt supporting a strand and cable. In the past, this hardware facilitated placing a single cable and strand on a pole where additional clearance was required to avoid contact with a power company vertical run. This application is still relevant and approved for use throughout Bell Atlantic today. Recently, it has come to our attention that cable extension bolts and straps have also been used in some areas of Bell Atlantic North to **temporarily** place an additional (second) strand and cable at the same height, on the same side of the pole, as an existing cable and strand. This **temporary** application for a second cable and strand is now approved for use throughout Bell Atlantic. It should not, however, be used as a permanent method of attaching a second cable and strand.

The extension bolts are available in two sizes: the S type for use with a 5/8" suspension bolt (SSI # 700 064 355) and the C type for use with a ¾" suspension bolt (SSI # 700 064 363). The Extension Bolt (E. B.) Reinforcing Strap should always be used to support the outer end of the extension bolt and cable. The strap is available in two sizes, corresponding to the two types of extension bolts. The C type is SSI # 400 314 803, while the S strap is SSI # 400 314 811.

The use of the extension bolt is limited to cables not over 5 pounds per foot with a maximum 10M strand. It cannot be used on spans exceeding 150 feet and shall not be attached to cable extension screws. For more details on its use and application, including diagrams, refer to Bell System Practice 627-220-200 and specifically, the NY addendum, Issue G, December 1978. Bell Atlantic will not permit licensees to attach their cable extension bolts to our suspension bolts (for reasons stated in item two (2) above), but they may use them with their own suspension bolts within the same limitations as previously stated.

5) Replace the pole with one of an appropriate height.

POLE LOADING CONSIDERATIONS

With the passage of the 1996 Telecommunications Act, the likelihood of having many new licensees apply for space on our poles increases dramatically. Consequently, the Facilities Management Engineer must consider pole loading as part of their engineering process each time an additional cable is attached to a pole. This process applies to Bell Atlantic cables as well as all attachments being applied for by the licensees. Before applications for additional attachments can be approved, the engineer should calculate pole loading based on the specifications provided by the licensee for the additional attachments.

There are three types of pole loading: transverse storm loading, vertical loading and bending moments due to eccentric loads or unbalanced tensions. Transverse storm loading determines the required class for most poles. Vertical loads may be a controlling factor for poles carrying large cables or transformers, while bending moments usually control at unguyed corners and deadends.

For more information on calculating pole class requirements based on pole loading, refer to section 14, pages 14-22 of the Outside Plant Engineering Reference Manual. For greater detail, refer to the following AT&T practices: 919-120-100 and 919-120-700.

UN-APPROVED METHOD FOR ADDITIONAL POLE ATTACHMENTS

The Cable Extension Bracket referred to in figure 3, on page 34 of the Bell Atlantic Practice, Issue A, 620-060-100 titled, "Bell Atlantic Fiber Optic Cable Placing Practice" dated March 1995 **is not an approved product. This hardware should not have been included in that document.** Although the diagram in figure 3 looks convincing, the reality is that it is not designed for use on a pole as the attachment hole is not large enough for a 5/8" bolt. **Do not use the Cable Extension Bracket.** The same hardware is also referred to in paragraph 7.02, page 10 of the same practice. In this context, it is also listed as a CATV-L bracket. Facilities Management will arrange to have this practice updated to eliminate this error.

ACKNOWLEDGMENTS

I would like to express appreciation to Wesley Wolfert, Alan Young, Bob Langhage, Jim Giancola, Rich Karig, Nick Goff, Don Cameron, John Addicks, Rich Fowler, Tom Gavin, George Belcher, Marc Berlinger, Jim Schafer and Jim Slavin for their suggestions, time and input in helping to prepare this document.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Application by Verizon New England	)	
Inc., Bell Atlantic Communications,	)	
Inc. (d/b/a Verizon Long Distance),	)	CC Docket No. 00-176
NYNEX Long Distance Company	)	
(d/b/a Verizon Enterprise Solutions),	)	
and Verizon Global Networks Inc., for	)	
Authorization To Provide In-Region,	)	
InterLATA Services in Massachusetts	)	

JOINT REPLY DECLARATION OF KATHLEEN McLEAN AND RAYMOND WIERZBICKI

1. My name is Kathleen McLean. I am Senior Vice President, OSS Policy and Performance Assurance within the Information Technology organization for Verizon. I submitted a Declaration jointly with Raymond Wierzbicki as part of Verizon New England Inc.'s ("Verizon's") above-captioned Application to provide in-region interLATA services in Massachusetts. My qualifications are set forth in that Declaration.

2. My name is Raymond Wierzbicki. I am Group President – Wholesale Unbundled and Resale Services for Verizon Services Group. I submitted a Declaration jointly with Kathleen McLean as part of Verizon's above-captioned Application to provide in-region interLATA services in Massachusetts. My qualifications are set forth in that Declaration.

I. Purpose.

3. The purpose of our statement is to address certain inaccurate or misleading statements contained in the Comments and supporting Declarations filed in this

proceeding by many of the commenters. None of the claims by Verizon's competitors demonstrate that Verizon fails to provide non-discriminatory service to CLECs or that Verizon has failed to meet the requirements of the 1996 Act. Indeed, a number of the comments confirm that the systems, interfaces, and processes through which Verizon provides access to its operations support systems ("OSS") for CLECs enable them to compete for customers and that they are already successfully handling commercial volumes.

II. Verizon's Electronic OSS Interfaces Are in Place, Operational, and Already Handling Commercial Volumes.

4. As noted in our initial Declaration, Verizon provides electronic interfaces that give CLECs access to Verizon's OSS for each of the key functions – pre-ordering, ordering, provisioning, maintenance and repair, and billing. Those interfaces are fully operational, and Verizon is already handling significant commercial volumes. Indeed, the volumes have continued to grow since our filing. In August, Verizon processed more than 53,300 ordering transactions in Massachusetts and in September, more than 54,200 ordering transactions. Monthly pre-order transactions exceeded 198,000 for both August and September in Massachusetts.

5. WorldCom claims that Verizon has little commercial experience with its OSS in Massachusetts because Verizon processed only 5,000 UNE-platform orders in July and only four of those were submitted over the Electronic Data Interchange ("EDI") interface. WorldCom Br. at 38-39. *See also* ASCENT at 6 (parroting WorldCom's claims). This claim is contrary to fact. As the Dr. Taylor shows, in proportion to the number of access lines in the state, competition in Massachusetts is ahead of competition in New York at the time Verizon filed its application there, both overall and in every

category except UNE-platforms. *See* Taylor Decl., Att. C. Therefore, on a proportional basis, Verizon's OSS have handled orders for more products in Massachusetts than they had in New York at the time of the 271 application there.

6. In addition, as we noted in our Declaration, Verizon's interfaces and gateway systems for Massachusetts are identical to those used in New York. The underlying OSS for pre-ordering, ordering, provisioning, maintenance and repair and most components of billing are the same applications in Massachusetts and New York. In most cases there are separate copies for New England (including Massachusetts) and New York, although in some cases one copy serves both areas. Within billing, there are different components between New York and New England for message and payment processing. A detailed comparison of the interfaces, gateway systems, and OSS for New England (including Massachusetts) and New York is Attachment A to our Reply Declaration. As we explained in our Declaration, those OSS and interfaces are already handling commercial volumes, and are capable of handling the combined expected future demand for New York and New England (including Massachusetts).

7. WorldCom argues, nevertheless, that Verizon cannot rely on its experience in New York here because a large number of the business rules for the LSOG 2/3 version of the EDI interface are not uniform between Massachusetts and New York, and even with LSOG 4, 20% of the business rules differ between Massachusetts and New York. WorldCom Br. at 39-40; Kwapniewski/Lichtenberg Decl. ¶¶ 30-36. Verizon is unaware of the basis of the statement by WorldCom. Verizon has conducted extensive collaborative sessions with CLECs concerning LSOG 4 Pre-order and Order uniformity. Several sessions were held in the 3rd and 4th quarters of 1999 and additional sessions are

being conducted now. Where differences exist between jurisdictions, it is generally related to product/tariff differences. Those specific cases affect the business rules for less than 1% of fields, and they have been explained to and accepted by CLECs in the collaborative forum.

8. Finally, WorldCom argues that Verizon cannot rely on the New York systems because the OSS that exist today in Massachusetts and New York are substantially different from what was in place in New York when the New York application was approved. WorldCom Br. at 40; Kwapniewski/Lichtenberg Decl. ¶¶ 30-36. As reviewed by the DTE, and as described in our Declaration, the majority of the OSS that support Massachusetts and New York today were in use in both Massachusetts and New York when the New York application was approved. There have been only three significant changes to the interfaces and OSS used in Massachusetts and New York since the New York 271 application was approved. Far from undermining Verizon's application, all three enhance the access provided to Verizon's OSS or the information provided to the CLECs and have been tested by KPMG.

9. The first is the replacement of the ECXpert software in the EDI interface with Netlink. *See* McLean/Wierzbicki Decl. ¶ 65. As the Commission is aware, this change was critical in resolving the delayed status notice issue in New York in the early part of this year, and the performance reports filed by Verizon with the Commission and with the New York PSC showed excellent performance following this change. *Id.* ¶¶ 66-67. The second significant change is the completion of the LiveWire rollout to replace PREMIS which was completed in February 2000. This change enhanced the address validation and telephone number selection and reservation process for CLECs in

addition to increasing uniformity in the interfaces among the states. Finally, Verizon implemented the latest approved specifications from the Ordering and Billing Forum of ATIS, LSOG 4, for both pre-ordering and ordering. *See* McLean/Wierzbicki Decl. ¶¶ 22-23, 41-42. This change enhanced the functionality available to CLECs and increased the uniformity of the pre-ordering and ordering interfaces and gateway systems. Concurrent with the LSOG 4 implementation, Verizon implemented the gateway system used in the former Bell Atlantic South service areas, Request Manager, in the former Bell Atlantic North service areas.

10. As noted in our Declaration, Verizon is already handling commercial volumes over LSOG 4 through its common interface and gateway systems. As of the end of July, Verizon had received 432,000 LSRs over LSOG 4 throughout the former Bell Atlantic states. *Id.* ¶ 42. In the following two months, LSOG 4 volumes more than doubled. Through September, Verizon has received a total of more than 924,000 LSRs in LSOG 4 format. CLECs are making the transition to LSOG 4 in jurisdictions they chose and on schedules convenient to them. The first CLECs started using LSOG 4 over the Web GUI and EDI immediately after the March 1 release. By September, more than 95 CLECs have begun using LSOG 4, including a major CLEC that flashcut all of its EDI ordering transactions to LSOG 4 with the June release. In short, the changes to the OSS and interfaces Verizon has made since its New York application was approved have improved CLEC access to Verizon's OSS.

11. Further, Verizon's OSS and interfaces serving Massachusetts were thoroughly tested by KPMG Consulting. The Massachusetts DTE described KPMG's test as "comprehensive." DTE Evaluation at Executive Summary. WorldCom

nevertheless argues that KPMG's test was "limited in scope" and did not fully investigate issues within its scope. WorldCom Br. at 41; Kwapniewski/Lichtenberg ¶¶ 62-66. WorldCom's complaints about what KPMG did not test, however, are themselves extremely limited, and do not suggest any flaws in the KPMG test.

12. WorldCom raises only four items in support of its claim that KPMG's test was limited. One, concerning metrics, is discussed in Ms. Guerard's and Ms. Canny's Reply Declaration. WorldCom complains that KPMG did not fully test LSOG 4 because it did not conduct a volume or stress test of LSOG 4. WorldCom Br. at 41; Kwapniewski/Lichtenberg ¶¶ 64-65. KPMG performed a functional evaluation of LSOG 4 – that is, it reviewed LSOG 4's ability to handle pre-order and order requests for a range of different functions and services. KPMG Final Report at 22-24, 61-64. As discussed above, LSOG 4 is already in commercial use and handling substantial volumes of transactions. As a result, there was no need for KPMG to conduct a volume test of LSOG 4.

13. WorldCom also argues that KPMG did not assess the line loss notification report that Verizon sends to CLECs, and further claims that the line loss reports are inaccurate. Kwapniewski/Lichtenberg Decl. ¶¶ 147-151. The fact that KPMG did not "test" the Line Loss Report is irrelevant; this issue was raised in the state proceedings and the DTE reviewed the actual commercial activity described in our Declaration. Our Declaration demonstrated that the accuracy of these reports is very high – the percent of working telephone numbers reported as missing or incorrect averaged less than half of one percent for May, June, and July; as the updated chart in Attachment B shows, accuracy continued to be very high in August and September.

14. Moreover, Verizon continues to work with CLECs on the Line Loss Report. Through ongoing CLEC support processes, CLECs report specific concerns with the Line Loss Report to Verizon by calling the Wholesale Customer Care Center ("WCCC"). The WCCC directs the information to a Line Loss specialist for investigation and resolution, which is communicated back to the CLEC. Verizon has conducted working conference calls with individual CLECs to review Line Loss Report issues and gain better understanding of the CLECs' issues. In addition, the status of outstanding issues and improvements to the Line Loss Report are discussed each month with all CLECs in the CLEC Change Control meetings. Z-Tel, which raised issues with the Line Loss Report in the proceeding before the Massachusetts DTE, stated that its concerns have largely been addressed. Z-Tel Br. at 3, n. 3.

15. Finally, WorldCom complains that KPMG did not apply the measures from New York to assess "missing" status notices. KPMG testified, however, that it did pay particular attention to the issue of status notices in the Massachusetts test. Tr. 4993 (corrected numbering) (Aug. 28, 2000). KPMG reviewed the completion notification process in its evaluation. Of the 592 Resale and UNE provisioning completion notices received, 92.9% were received by noon one business day following the completion date. An additional 4.1% were delivered after noon on the business day following the provisioning completion date and 2.5% were delivered two business days following the completion date. KPMG indicated that 14 provisioning completion notices that it expected to receive were not received by KPMG. KPMG Final Report at 53. Of the 14 provisioning completion notices not received by KPMG, Verizon determined that one was for an order which Verizon had queried and was still waiting for a response from

KPMG, four related to a minor system glitch that was corrected on May 25, and the remaining nine were related to two additional minor system glitches that were fixed on August 19, 2000.

16. KPMG also evaluated the timeliness of the Billing Completion Notices ("BCN"), but it measured a service order's Billing Completion Date from the completion date element returned within the BCN response rather than from the CRIS Bill Completion Date and time as defined by the Carrier-to-Carrier Guidelines. KPMG Final Report at 54.

17. During the normal course of operations, there will be circumstances when a CLEC is expecting to receive a status notifier from Verizon and it does not. In these circumstances, CLECs follow a PON Exception process to report the missing/delayed notifier condition to Verizon's WCCC. This process was developed for EDI-transmitted PONs in New York and extended to the other former Bell Atlantic service areas. Verizon provides the CLEC with the status of the PON, and, if the requested notifier has been generated, resends the notifier to the CLEC. There are cases when the notifier may not exist. For example, a CLEC may be expecting a provisioning completion notifier, but Verizon has not provisioned the order due to lack of access to the customer premise; the order has not been provisioned so a provisioning completion notifier does not exist.

18. WorldCom also argues that, within the scope of what KPMG tested, KPMG's evaluation does not prove that Verizon's OSS are operationally ready because it closed observations and exceptions without root cause analysis, and because its discussion of individual test points reveals problems that are not evident in KPMG's overall "Satisfied" evaluations. WorldCom Br. at 41; Kwapniewski/Lichtenberg ¶¶ 50-

61. *See also* ALTS at 23 (claiming that KPMG's 110 observations show that Verizon's ordering systems are "set up to fail at every level"); OnSite at 12-13 (noting number of KPMG's observations and exceptions, and expressing doubt that Verizon could resolve six exceptions between June 29 and September 7, 2000).

19. When KPMG issued observations and exceptions, Verizon responded and corrected the problem if required (in some instances, observations resulted from KPMG misunderstandings or requests for additional information, which merely required explanation by Verizon). As the Massachusetts DTE, which supervised KPMG's test, noted, "Observations and Exceptions were discussed in conference calls, and, when the specific issue required, KPMG performed retests to ensure that VZ-MA's stated changes had been effectively implemented." DTE Evaluation at 46.

20. WorldCom raises just three comments by KPMG in support of its argument. First, it states that Verizon returned inaccurate address validations on 64% of the samples viewed. Kwapniewski/Lichtenberg Decl. ¶ 51. As the Massachusetts DTE notes, this issue is peculiar to the creation of KPMG's test bed and cannot occur in a commercial environment. KPMG reported that it received "SUIT" or "UNIT" designations in address validation responses where it expected "APT." This occurred because KPMG's test accounts were manually entered into the address database and the billing systems by two separate groups of Verizon employees, who used the different designations. In commercial operation, address data is updated by a mechanized feed into LiveWire (the address validation database), and service representatives would use that database to prepare the service order for new accounts, which would then be entered into the billing systems. *See* DTE Evaluation at 93, n. 279.

21. Second, WorldCom notes that KPMG failed to receive responses on 2% of its pre-order transactions, and states that the failure rate was originally 6% "until Verizon implemented some unspecified fix." Kwapniewski/Lichtenberg Decl. ¶ 52. The Massachusetts DTE described the fix in its evaluation. DTE Evaluation at 92-93, n. 275. In any event, KPMG successfully retested its inquiries.

22. Finally, WorldCom points to a comment by KPMG that the error remarks returned by Verizon in response to defective pre-order inquiries "did not provide an adequate level of information to determine the cause of error in all cases examined." Kwapniewski/Lichtenberg Decl. ¶ 53, citing KPMG Final Report at 58. WorldCom appears to believe that KPMG found this occurrence in a significant number of inquiries, but the report does not support WorldCom's surmise – it merely states that KPMG noted this occurrence, but overall, found Verizon's error messages to be clear and accurate. KPMG Final Report at 58. The problems referenced by KPMG at POP 1-6-5 were corrected on July 27. WorldCom does not state that it has encountered any of these problems in its own operations, and no other CLEC indicates that it has had such a problem either.

23. As indicated in our initial Declaration, KPMG examined 804 test points and concluded that Verizon had satisfied the evaluation criteria on 800 of them – over 99%. The remaining four items, two of which concern the change control process used to update performance measurements, and two of which concern intervals provided to CLECs for ISDN services, are extremely limited in their effect. As is more fully explained in the Guerard/Canny Declaration, the DTE conducted its own examination of the change control process for performance measurements, and concluded that Verizon's

defined metrics change control process sufficiently records changes to the metrics calculation process and allows for effective tracking of such changes. DTE Evaluation at n. 296.

24. In connection with the two items related to due date intervals for certain ISDN migrations, Verizon resolved the problems and the DTE has indicated that it will continue to monitor Verizon's performance in this area. DTE Evaluation at 158-159, n. 486.

III. Verizon's Pre-Ordering Interfaces and OSS Enable CLECs to Serve Their Customers in Substantially the Same Time and Manner as Verizon Does.

20. WorldCom complains that the Web GUI is often unavailable, and provides a list of outages it claims to have experienced from October 28, 1999 through October 8, 2000. Kwapniewski/Lichtenberg Decl. ¶¶ 129-141 and Attachment 6. WorldCom admits that its data are from New York, not Massachusetts, and that they include outages (including scheduled and announced outages) of the underlying OSS as well as the Web GUI. Kwapniewski/Lichtenberg Decl. ¶¶ 133, 139. As explained in our Declaration, if the underlying OSS is out of service, either for scheduled downtime or an unscheduled outage, it is equally unavailable to CLECs and to Verizon representatives. It is availability of the interface, therefore, which could create a difference in the ability of CLECs and Verizon representatives to obtain access to Verizon's OSS. Moreover, while the availability of the interface is the same whether a CLEC is operating in Massachusetts or New York, there may be differences in the availability of the underlying OSS between Massachusetts and New York. For example, where identical copies of software are running on two comparable but separate hardware complexes, there could be an outage that would affect the availability of the complex used by CLECs and Verizon

representatives to serve New York customers but would not affect the availability of the complex used by CLECs and Verizon representatives to serve Massachusetts customers, and vice versa.

21. WorldCom similarly presented a list of outages in the proceedings before the Massachusetts DTE. In response to a data request from the DTE, Verizon conducted an extensive analysis of the incidents cited by WorldCom and identified the small sub-set of instances that were related to the unavailablity of the interface itself; the majority of the incidents in WorldCom's list were related to specific back-end OSS that similarly affected retail and wholesale transactions, and many of which had no effect in Massachusetts. DTE Evaluation at 90. *See* Attachment C. As explained in our Declaration, Verizon made significant infrastructure improvements in May and June which were reflected in substantially improved Web GUI availability in July (99.93%). We also described CLEC behaviors (robots and unqualified searches) which have adversely affected performance and GUI availability, and which Verizon is working with CLECs to have them cease. Verizon provided the same information to the DTE, which concluded that Verizon provides competitors with nondiscriminatory access to its pre-ordering OSS. DTE Evaluation at 99.

22. OnSite also complains about interface availability, but it cites only WorldCom's and AT&T's claims in the state proceeding. OnSite at 16-17. The AT&T claims relate to an interface that OnSite does not even use; CORBA is only used by AT&T and Verizon's separate data affiliate in New York. Moreover, AT&T did not raise any of these claims in its comments here. In any event, the Massachusetts DTE reviewed

AT&T's claims that were before it, and concluded that Verizon's interfaces provide nondiscriminatory access to the pre-ordering OSS. DTE Evaluation at 87-88, 99.

23. WorldCom raises issues with respect to two specific pre-ordering transactions. First, it claims that Verizon's SMARTS Clock is returning due dates that are too long in Pennsylvania and New York. Kwapniewski/Lichtenberg Decl. ¶¶ 143-144. Second, it claims that in Pennsylvania and New York Verizon has recently begun returning a notice that telephone numbers are unavailable in response to some telephone number reservation transactions. *Id.* ¶ 145.

24. Neither of these claims relates to WorldCom's experience in Massachusetts, and no other CLEC raises these issues. As Ms. Guerard and Ms. Canny show, Verizon provides CLECs with the due date they request 94% of the time. Guerard/Canny Decl. ¶ 77 and Att. J. Verizon is not aware of problems regarding unavailable telephone numbers for CLECs. Without specific information, Verizon is unable to investigate or respond to WorldCom's claims.

IV. Verizon's Ordering Systems and Processes Are Handling Significant Commercial Volumes of Orders.

25. WorldCom claims that Verizon processes "too many orders manually in New York and processes an even higher percentage of orders manually in Massachusetts." Kwapniewski/Lichtenberg Decl. ¶ 154. As explained in our Declaration, however, resale orders, UNE loop orders, and UNE-platform orders each flow through at a comparable or *higher* rate in Massachusetts than they did in New York at the time the New York 271 application was approved. *See* Attachment D.

26. WorldCom also argues that Verizon cannot show that it is capable of timely and accurate manual processing of orders in Massachusetts because "commercial

experience remains minimal." Kwapniewski/Lichtenberg Decl. ¶ 155. This is simply wrong. As discussed above, on a proportional basis, "commercial experience" in Massachusetts is ahead of experience in New York at the time of the New York application overall and for every category except UNE-platform. Moreover, as shown in Attachment E to Guerard/Canny Decl. and Attachment D to Guerard/Canny Reply Decl., Verizon's processing of orders that require manual intervention is even *better* in both timeliness and accuracy than it was in New York at the time the New York 271 application was approved.

27. WorldCom also claims that there is no evidence that the same order types flow through in Massachusetts and New York and, in any event, Verizon has not kept its promise to improve the flow through rate in New York. WorldCom Br. at 47. The Massachusetts DTE has already considered and rejected WorldCom's claim concerning flow through improvements in New York. As the DTE noted, Verizon has implemented the flow through improvements WorldCom referred to, which were aimed at improving flow through for UNE-platform. As a result, the flow through rate for platform orders has increased. DTE Evaluation at 124.

28. WorldCom also claims that Verizon has a persistent problem with missing notifiers, and points particularly to its experience in Pennsylvania. WorldCom Br. at 42-44; Kwapniewski/Lichtenberg Decl. ¶¶ 40-49. Verizon's systems in Pennsylvania are not the same as the systems in Massachusetts. In any event, the Massachusetts DTE notes that WorldCom did not provide supporting documentation for any such claims in the state proceeding. *See* DTE Evaluation at 116-117. Verizon reiterates that there is not a "persistent problem with missing notifiers" in Pennsylvania or elsewhere. There are

circumstances in the normal course of operations when a CLEC expects to receive a notifier from Verizon and does not. Verizon established the PON Exception process to provide CLECs with the status of the PONs in question and to reflow notifiers when such notifiers exist. For the notifiers raised by WorldCom, Kwapniewski/Lichtenberg Decl. ¶ 123, WorldCom followed the PON Exception process to report its missing/delayed notifier to Verizon through the WCCC and Verizon provided WorldCom with the status of the PONs. WorldCom was looking for billing completion notifiers and did not receive them because the PONs had not progressed to the state to generate the notifier – more specifically, the billing system had not been updated for a sub-set of the PONs processed for WorldCom in Pennsylvania. As of October 19th, 97.3% of the PONs submitted by WorldCom in August and September had been completed. The remaining 2.7% are being worked by Verizon to clear billing issues and jointly with WorldCom to resolve orders in a jeopardy status.

29. OnSite also claims that CLECs have experienced problems receiving order status notifications, but in support, it raises AT&T's claims from the proceeding before the Massachusetts DTE. OnSite at 18-19. AT&T did not make any of these claims in this proceeding. Moreover, the DTE thoroughly reviewed AT&T's claims and Verizon's response, and determined that Verizon meets its obligation to provide nondiscriminatory access to it ordering OSS. DTE Evaluation at 116-122; 147.

V. Verizon's Electronic Interfaces Provide CLECs with Nondiscriminatory Access to Its Maintenance and Repair OSS.

30. Only WinStar submitted any comment on Verizon's maintenance and repair interfaces, and that was based not on its own experience, but on a filing by Covad and Rhythms in the Massachusetts proceeding. WinStar Br. at 24 and n. 90. Neither

Covad nor Rhythms raised the issue in this proceeding. Before raising it in the state proceeding, neither Covad nor Rhythms had brought their complaint to any of the forums open to CLEC comments, including the NY PSC Collaboratives on DSL and Line Sharing. Verizon provides training classes, User Guides, and other documentation to help CLECs understand and use RETAS, and this Commission has already found that "Bell Atlantic permits competing carriers to open trouble tickets immediately on recently-completed service orders." *See Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act to Provide In-Region, InterLATA Service in the State of New York*, Memorandum Opinion and Order, 15 FCC Rcd 3953, ¶ 216 (1999). KPMG performed an extensive expert review of the user friendliness of RETAS and found that the procedures for entering trouble reports and receiving results was clear and understandable. KPMG Final Report at 252.

VI. Verizon Provides Accurate and Timely Billing.

31. WorldCom claims that Verizon provides unbundled loop bills only in paper format, and further claims that, although WorldCom has tried to initiate electronic billing in response to Verizon's letter of January 2000 stating it was available, Verizon has been unable to make it work so far. WorldCom Br. at 49; Kwapniewski/Lichtenberg Decl. ¶¶ 167-168. Again, WorldCom's claim relates only to New York. Verizon's records indicate that WorldCom received its September and October bills for unbundled loops in New York in electronic format.

32. WorldCom complains that when Verizon does send bills electronically, it has no way to verify that the bills have been sent and received, and no way to track payments. According to WorldCom these problems frequently result in Verizon blaming

CLECs for late payments, and imposing late payment charges on them. WorldCom Br. at 49; Kwapniewski/Lichtenberg Decl. ¶¶ 169-170. WorldCom is simply wrong. Verizon monitors its electronic bill transmissions to ensure completeness. All electronic bill transmissions between Verizon and its customers have an "electronic handshake." If the transmission is completed and the handshake is completed, the transmission was successfully done. If the handshake is not completed, a Verizon employee investigates to determine the cause and resends the data electronically. In the proceedings before the DTE, WorldCom complained that its May UNE bill was late. When Verizon investigated, we learned that WorldCom had reported this problem directly to our system support center, and the bill was resent three hours after WorldCom called. WorldCom has not opened any trouble tickets concerning electronic bills since then.

33. Finally, WorldCom complains that both the wholesale bill and daily usage files often contain inaccuracies, and supports its argument with a claim that KPMG also found inaccuracies. WorldCom Br. at 49; Kwapniewski/Lichtenberg Decl. ¶¶ 172-173. Verizon has no complaints on file from WorldCom about inaccuracies in the wholesale bill or the daily usage file. Moreover, each and every billing observation and exception identified by KPMG has been satisfactorily closed.

34. WorldCom made the same claims before the Massachusetts DTE which reviewed them and Verizon's responses and determined that Verizon has shown that its billing systems are available in a manner that will allow an efficient competitor a meaningful opportunity to compete. DTE Evaluation at 185-188, 195.

35. WinStar claims that AT&T experienced missing call data problems in New York and Massachusetts. WinStar at 26. Again, AT&T has not raised this claim

here. The Massachusetts DTE did review AT&T's claims in the state proceeding, and as noted above, found that Verizon's billing systems are available to CLECs in a manner that allows an efficient competitor a meaningful opportunity to compete. DTE Evaluation at 184, 195.

VII. The Existing Change Management Process Ensures That CLECs Will Continue to Receive High Quality Service.

36. WorldCom claims that Verizon has not followed the Change Management process with respect to the implementation of ExpressTrak, a new billing OSS. According to WorldCom, Verizon has only provided limited information to CLECs, and even though implementation is already in place only for some customers in some states (and is not in place in Massachusetts), WorldCom claims that Verizon has not met the Change Management requirements. In particular, WorldCom claims that Verizon has not provided required documentation or a complete list of the new USOCs and FIDs. Finally, WorldCom claims that Verizon has not provided or promised to provide a regression test deck for ExpressTrak. WorldCom Br. at 44-46; Kwapniewski/Lichtenberg Decl. ¶¶ 102-115.

37. WorldCom made these same arguments before the Massachusetts DTE. As the DTE notes (and as WorldCom admits), ExpressTrak is a "back-end" system that is not subject to the same business rule and specification requirements as apply to interface software releases. Moreover, ExpressTrak will not be implemented in Massachusetts before the end of 2001. Nevertheless, Verizon has, in fact, conducted numerous sessions with CLECs in the CLEC Change Control forum concerning ExpressTrak, has provided "differences" documentation as related to the CLEC interfaces, has provided USOC lists to individual CLECs pursuant to proprietary agreements (as required by Telcordia) and

most importantly is addressing CLEC concerns with the ExpressTrak implementation within the Billing Collaborative sessions being conducted as part of the Bell Atlantic/GTE merger commitments to the FCC. Lastly, an ExpressTrak regression test deck is under development and is targeted for publication with the February 2001 release. The DTE found that Verizon has adhered to its Change Management process over time. DTE Evaluation at 61-63, 78.

38. WorldCom also criticizes the accuracy of Verizon's documentation. WorldCom points to KPMG's Exception 10, which found 27 inconsistencies in Verizon's LSOG 3 pre-order documentation and Exception 4 which found 162 inconsistencies in Verizon's business rule and EDI documentation for LSOG 4 for pre-ordering and ordering. WorldCom Br. at 44-45; Kwapniewski/Lichtenberg Decl. ¶¶ 74-75. As noted in our Declaration, however, the LSOG 3 pre-ordering documentation had 10,504 attributes. McLean/Wierzbicki Decl. Att. U. Twenty-seven inconsistencies therefore constitute approximately one-quarter of one percent of the attributes. Similarly, the pre-ordering and ordering documentation for LSOG 4 together had 19,244 attributes. *Id.* One hundred sixty-two inconsistencies is only 0.8% of the attributes.

39. As the Massachusetts DTE notes, the February 2000 release for LSOG 4 was the largest wholesale services release in Verizon's history. Because of the size of the release and because it was the first to use the CLEC Test Environment outside of New York, it did not go as well as Verizon had hoped. DTE Evaluation at 55-56. Improvements were made to address problem areas with the February release, and the second LSOG 4 release in June was much smoother. *Id.* at 56.